

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHARLENE MORRIS and RAMON SOTO,

individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

PIM BRANDS, INC.,

Defendant.

Case No.: 1:25-cv-00405

Hon. Andrea R. Wood

Magistrate Judge Jeannice W. Appenteng

**DEFENDANT PIM BRANDS, INC.'S MOTION TO DISMISS
PLAINTIFFS' CLASS ACTION COMPLAINT**

Defendant PIM Brands, Inc., by and through its undersigned counsel, hereby moves this Court to dismiss Plaintiffs' Class Action Complaint under Federal Rule of Civil Procedure 12(b)(6) and for the reasons set forth in the Memorandum in Support of this Motion, filed contemporaneously herewith.

Dated: November 19, 2025
Chicago, Illinois

Respectfully submitted,

By: /s/ Sean H. Suber
Sean H. Suber
Tyree Petty-Williams
WINSTON & STRAWN LLP
300 N. LaSalle Dr.
Suite 4400
Chicago, Illinois 60601
Tel.: (312) 558-5600
Fax: (312) 558-5700
ssuber@winston.com
tpettywilliams@winston.com

Amanda L. Groves*
Katelyn Taira⁺
WINSTON & STRAWN LLP
333 South Grand Avenue
38th Floor
Los Angeles, CA 90071
Tel.: (213) 615-1700
Fax: (213) 615-1750
AGroves@winston.com
KTaira@winston.com

Counsel for Defendant PIM Brands, Inc.

**Admitted Pro Hac Vice*

⁺ Pro Hac Vice Forthcoming

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record:

Elizabeth A. Fegan
Megan E. Shannon
FEGAN SCOTT LLC
150 S. Wacker Dr.,
24th Floor
Chicago, IL 60606
beth@feganscott.com
megan@feganscott.com
(312) 741-1019

/s/ Sean H. Suber

Sean H. Suber

An Attorney for Defendant PIM Brands, Inc.